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Open Universities and National Education Policy (NEP) 2020: Administrative Challenges and Implementation Framework in India

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Abstract:
The National Education Policy (NEP) 2020 aims to raise India's Gross Enrolment Ratio (GER) in higher education from about 27 per cent to 50 per cent by 2035 and expects open and distance learning (ODL) to contribute substantially to that goal. Open universities, created to serve working adults, rural learners, women and others excluded from campus-based study, are therefore central to the policy's feasibility. They exist, however, in a multi-layered administrative world of statutory Acts, regulations of the University Grants Commission (UGC), state government oversight and the new national digital initiatives. This conceptual paper uses document analysis for Policy documents, Regulations and official statistics till the early months of 2022, to analyse the challenges that are being faced in the implementation of NEP 2020 by the open universities and suggests a roadmap for the same. The challenges are broken down into six clusters—regulatory plurality, governance and autonomy, financing, human resources, digital infrastructure and learner support, and quality assurance and credit mobility. It advocates a five-pillar approach across a sequenced timeline (2022 – 2035) and believes that success will only come if there are examples of the regulation, funding, and institutional capacity aligned. Policy implications of the proposed Higher Education Commission of India and the state governments, as well as the open universities themselves, are highlighted.

Keywords: open universities; National Education Policy 2020; open and distance learning; higher education administration; implementation framework; India.

1. Introduction

Indian higher education has seen a faster growth than it has ever seen in the past but the enrollment is still not even. The All India Survey on Higher Education (AISHE) 2019-20 has recorded total enrolments as 3.85 crore and Gross Enrolment Ratio (GER) as 27.1 per cent compared to 24.3 per cent in 2014-15 (Ministry of Education [MoE] 2021). It is a respectable figure for a lower middle-income country, but is still very low compared to East Asian and Western systems, and masks large differences by gender, social group, region and place of residence. Land, faculty, and public funding, of course, are

limited, and are unlikely to bridge these gaps within a policy horizon of one decade, if expansion occurs on campus.

The National Education Policy (NEP) 2020 responds by setting a target of a 50 per cent GER by 2035 and by planning to add some 3.5 crore seats to the system (Ministry of Human Resource Development [MHRD], 2020). Open and distance learning (ODL) is expected to carry part of this load, alongside online education, digital repositories and credit-based recognition of massive open online courses (MOOCs). Open universities are at the heart of ODL. They are legally established to increase accessibility, to educate in large numbers and to reach the nonconformist learner. In India, there are currently the Indira Gandhi National Open University (IGNOU), over a dozen State Open Universities (SOUs) and numerous distance directorates within regular universities.

The teaching and learning aspect of open learning has been extensively talked about and less attention has been paid to the administrative aspect of open learning. Open universities are not a place where content is delivered. They operate large networks of study centres with limited resources, and run admission, examination, evaluation, learner-support and certification systems in these centres, frequently in a poorly resourced manner. The proposals of NEP 2020 transform the landscape of their work with the introduction of a single regulator, a new accreditation structure, multiple entry and exit, Academic Bank of Credit (ABC) and an expanding technology agenda. The policy, however, does not detail how open universities should deal with these changes. Administrations, regulators and state governments have that responsibility.

It is thus the purpose of this paper to pose three questions: First, what is the status of open universities in the current higher-education system in India? Secondly, what are the specific aspects of NEP 2020 that most directly affect them and what are the administrative challenges posed by these aspects? Third, how will 2035 look if the policy is to be realized in practice by third sector/third power entities such as third universities (open universities) or third sector/third power regulators and governments? The paper provides a coherent organization of the disjointed policy and regulatory information, and a phased approach that can be adapted by policymakers and university administrators for testing and modification. The argument is as follows. The conceptual and empirical literature is discussed in Section 2 and the method and its limitations in Section 3. Part 4 serves as an overview of the development of open universities and the NEP mandate; Part 5 presents an overview of the changes in the NEP mandate. Sections 8 and 9 offer some policy implications and conclusions, while Section 6 is reserved for analysis of administrative challenges, and the framework is proposed in Section 7.

2. Conceptual Background and Review of Literature

Distance education is frequently described as a gap between teacher and learner and the media and organised support used to overcome the gap (Moore & Kearsley, 2012). Open learning is a broader concept, which eliminates limitations of entry, pace, place and prior qualification (Peters, 2010). Open universities incorporate both concepts: they accept students with little prior knowledge, they are based on a multimedia approach, and they produce course material and provide support on a decentralized basis in an 'industrial' style. The biggest of these he called mega-universities, with over 100,000 active learners, whose economics are based on scale and shared course development and low marginal cost per additional learner (Daniel, 1996). Rumble (1997) demonstrated that such economics apply in two situations: when the number of enrolments is great and administrative systems are well controlled.

Open education has its roots in the recommendations of the Education Commission (1966) to extend the scope of correspondence courses and School of Correspondence Courses at the University of Delhi (1962). Garg et al. (2005) have done a retrospective of the four decades of distance education in India, and Manjulika and Reddy (1996) have described the Indian experience as a model that could be adapted by other developing countries. These works tend to be descriptive, and they are largely not of the past decade's regulatory and technological changes.

Research on the planning and management in distance education emphasizes that the planning and management system is a pedagogy. Panda (2003) believes that the ability to achieve quality at scale depends on the quality of planning, staffing, financing and student support management. The studies conducted with the faculty members at IGNOU indicate that attitudes, workload and infrastructure are determinants of the rate of e-learning adoption (Panda & Mishra, 2007). The quality assurance and accreditation of distance education requires a different approach to campus programmes (Jung & Latchem, 2012). In terms of design, support, and institutional commitment, Bates (2019) states that quality online learning is not just about technology, and Kanwar et al. (2010) note that OER can reduce costs and increase access in the Global South, but they need institutional commitment.

The early analysis of NEP 2020 emphasizes on its concepts of multidisciplinary, flexibility and access while also cautioning the need for funding and the federal coordination and institutional capacity for its implementation (Aithal & Aithal, 2020; Kumar et al., 2021). Useful lens from the wider implementation. Useful lens from wider implementation. Pressman and Wildavsky (1973) demonstrated that it was as much the number of actors required to enact a policy and the number of points of decision in the policy process as it was poor policy design that caused policy failure; similarly, Mazmanian and Sabatier (1983) identified clear goals and adequate resources and committed agencies to implement the policy as conditions for success. Both concepts directly relate to an ODL system under the control of the centre, the states, regulators and institutions themselves.

From this review, there are three gaps. Governance arrangements are not consistently distinguished in the ODL literature from other HEIs; the literature on ODL predates the NEP framework; and few studies link governance arrangements to outcomes of implementation. This paper tackles these gaps by applying a policy-oriented analysis and a framework from the implementation perspective described above.

3. Methodology and Scope

It is a conceptual and policy-analytical paper, which is derived from document analysis. The sources include the text of NEP 2020 and government announcements, the UGC regulations pertaining to ODL and online programmes, the UGC regulations on the implementation of credit transfer through SWAYAM, the official statistics from the reports generated by AISHE, enabling Acts and public information of open universities, and the scholarly literature on distance education and policy implementation. Open University documents were read for provisions that impact the governance, finance, academic operations, or regulation of open universities. The provisions were incorporated into six administrative domains: regulation, governance, finance, human resources, technology and learner support, and quality and credit mobility. Each NEP provision was then compared with the current institutional arrangement, and challenges were identified.

There are limitations related to the study. It does not provide primary survey information, and the qualitative ratings in Table 4 are not measured, but rather the subjective ratings of the author. Official enrolment data are one to two years behind the policy: The most recent AISHE report is for 2019–20, a

year heavily impacted by the COVID-19 pandemic, and AISHE includes distance enrolment based on institution, not learner, location. NEP 2020 is a policy statement and not a statute and some of the mechanisms were still being worked out in early 2022. The results should therefore be interpreted as a knowledgeable reflection of a changing policy context and the framework as a testing ground for policies rather than a prescription.

In this paper open universities refer to the open universities set up by an act of parliament or a state legislature as open universities, i.e., IGNOU and the state open universities as listed in Table 1. Where relevant, conventional universities that provide distance and/or online programmes are covered, but they are not part of the core analysis. The reference period is early 2022, and development since this period is not considered.

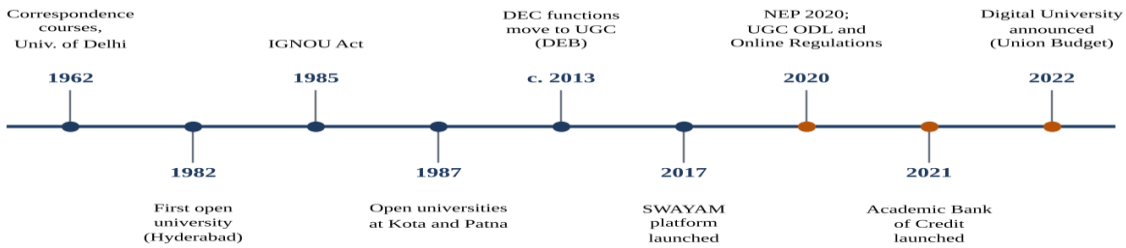
4. Open Universities in India: Evolution and Present Status

4.1 Evolution

Distance education began in India in 1962 with the School of Correspondence Courses at the University of Delhi, and over the following two decades several universities opened correspondence directorates. The first open university, Andhra Pradesh Open University (now Dr. B. R. Ambedkar Open University, Hyderabad), was established in 1982. IGNOU followed in 1985 under an Act of Parliament (Government of India, 1985) and was given a dual role: to teach, and to promote and coordinate distance education across the country. A wave of state open universities followed, beginning with Kota and Patna in 1987 and extending through Maharashtra, Madhya Pradesh, Gujarat, Karnataka, West Bengal, Uttar Pradesh and Tamil Nadu, with later additions in Uttarakhand, Chhattisgarh, Assam and Odisha (Table 1). Figure 3 places these developments alongside the policy milestones that now shape the sector.

Figure 3

Milestones in the Development of Open and Distance Learning in India



Note. Compiled by the author from MHRD (2020), UGC (2020, 2021), Government of India (1985) and Sitharaman (2022). DEC = Distance Education Council; DEB = Distance Education Bureau.

Table 1

Open Universities in India: Selected List by Year of Establishment

No.	Open university	Location	Year	Type
1	Dr. B. R. Ambedkar Open University (originally Andhra Pradesh Open University)	Hyderabad, Telangana	1982	State
2	Indira Gandhi National Open University	New Delhi	1985	Central
3	Vardhaman Mahaveer Open University	Kota, Rajasthan	1987	State
4	Nalanda Open University	Patna, Bihar	1987	State
5	Yashwantrao Chavan Maharashtra Open University	Nashik, Maharashtra	1989	State
6	Madhya Pradesh Bhoj (Open) University	Bhopal, Madhya Pradesh	1991	State
7	Dr. Babasaheb Ambedkar Open University	Ahmedabad, Gujarat	1994	State
8	Karnataka State Open University	Mysuru, Karnataka	1996	State
9	Netaji Subhas Open University	Kolkata, West Bengal	1997	State
10	Uttar Pradesh Rajarshi Tandon Open University	Prayagraj, Uttar Pradesh	1998	State
11	Tamil Nadu Open University	Chennai, Tamil Nadu	2002	State
12	Uttarakhand Open University	Haldwani, Uttarakhand	2005	State
13	Pt. Sundarlal Sharma (Open) University	Bilaspur, Chhattisgarh	2005	State
14	Krishna Kanta Handiqui State Open University	Guwahati, Assam	2006	State
15	Odisha State Open University	Sambalpur, Odisha	2015	State

Note. Compiled by the author from the enabling Acts and public information of the universities. The list is selected and not exhaustive; many conventional universities also offer programmes through distance directorates.

Regulation has changed as the sector has grown. Until about 2013 the Distance Education Council (DEC), housed in IGNOU, regulated distance education; its functions were then transferred to the UGC, which created the Distance Education Bureau (DEB). UGC regulations in 2017 and 2020 progressively tied the right to offer ODL to quality indicators and, in 2020, brought ODL and online programmes under a single framework. Under the 2020 regulations, institutions with a National Assessment and Accreditation Council (NAAC) score of at least 3.26 or a place among the top 100 institutions in the National Institutional Ranking Framework (NIRF) can offer ODL and online programmes without prior permission (UGC, 2020).

4.2 Present Status

Distance education is a substantial part of the system. AISHE 2018–19 recorded about 39.7 lakh learners in the distance mode, roughly one tenth of the total enrolment of 3.74 crore (MHRD, 2019). Because AISHE reports distance enrolment by the location of the institution, and not that of the learner, the figures do not show where distance learners live, and they limit analysis of regional access (MoE, 2021). Table 2 summarises the headline indicators available in the AISHE reports for the years used in this paper.

Table 2

Selected Higher Education Indicators from the All India Survey on Higher Education

Indicator	2014–15	2018–19	2019–20
Total enrolment (crore)	3.42	3.74	3.85
Gross Enrolment Ratio (%)	24.3	26.3	27.1
Average annual change in GER since previous column (percentage points)[a]	—	0.50	0.80
Distance-mode enrolment (lakh)	—	39.72	—

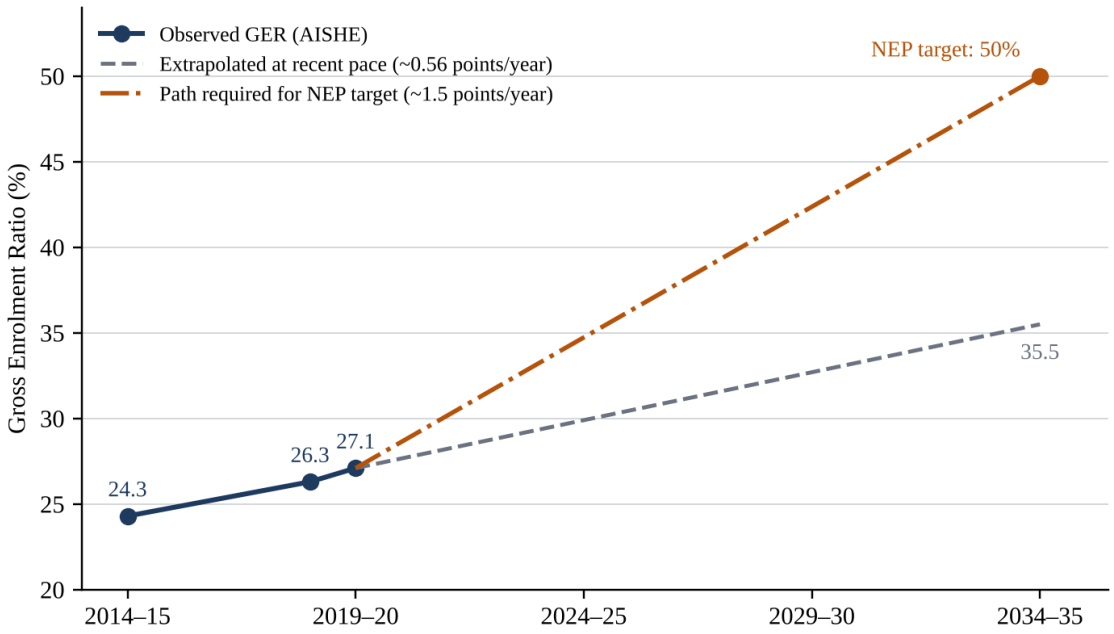
Note. Data from MHRD (2019) and MoE (2021). A dash (—) is used to signify that the number was not known in the sources used, or was not known in more than one year.

The GER increased by 0.50 per cent on average each year from 2014–15 to 2018–19 and 0.80 points between 2018–19 and 2019–20, indicating a certain acceleration. However, a single year's change is not enough to provide a trend, and comparisons between different editions of AISHE require care as population estimates are revised from time to time and the GER is calculated.

Open universities' mission is access to education. They enroll working adults, homemakers, rural learners, and those that dropped out of formal education; and they generally require flexible pacing, lower costs than campus study and materials in regional languages. These strengths are in line with the goals of equity for NEP 2020. However, as Figure 1 demonstrates, the scale of the challenge is apparent in the figures in Table 2 as well. The GER increased approximately 2.8 percentage points (or 0.56 points annually) between 2014–15 and 2019–20. In order to reach 50 per cent by 2034–35, the GER increase of approximately 1.5 points per year would need to be sustained, an increase that is almost a triple of the level of increase recently experienced. A simple extrapolation of this trend would result in a GER of approximately 35 per cent. The policy seeks to address this gap through ODL/online provision, as incremental growth in campus capacity is unlikely to fill the gap.

Figure 1

Observed Gross Enrolment Ratio and the Path Required to Reach the NEP 2020 Target



Note. Observed values are from MHRD (2019) and MoE (2021). The extrapolation and the required path are the author's calculations, assuming linear change from 2019–20 to 2034–35. GER values follow the population base used in each AISHE report.

5. NEP 2020 and the Mandate for Open and Distance Learning

NEP 2020 was approved by the Union Cabinet on 29 July 2020 and replaces the policy of 1986, as modified in 1992. Its vision for higher education includes large multidisciplinary institutions, flexible curricula with multiple entry and exit points, a four-year undergraduate programme, a focus on research, and a regulatory system that is light but tight. The policy proposes a single regulator, the Higher Education Commission of India (HECI), with four verticals for regulation, accreditation, funding and standard setting, namely the National Higher Education Regulatory Council, the National Accreditation Council, the Higher Education Grants Council and the General Education Council (MHRD, 2020).

On ODL, the policy recognises the mode as an important means of raising the GER and commits to measures intended to make ODL programmes comparable in quality with the best in-class programmes. These include online courses and digital repositories, funding for research, student services and the credit-based recognition of MOOCs (MHRD, 2020). The surrounding policy environment has since developed. The UGC allows a part of a programme's credits to be earned through courses on SWAYAM, the national MOOC platform launched in 2017 (UGC, n.d.). The ABC was launched in July 2021 to register and transfer credits among institutions (UGC, 2021). The Union Budget for 2022–23 announced a Digital University to offer education through a hub-and-spoke network (Sitharaman, 2022). Table 3 relates the main provisions to open universities.

Table 3

Selected NEP 2020 Provisions and Their Relevance to Open Universities

NEP 2020 provision	Relevance to open universities	Main administrative implication
GER of 50% by 2035; about 3.5 crore new seats	Larger expected role for ODL and online provision	Capacity planning, enrolment targets, regional reach
Single regulator (HECI with four verticals)	Replaces separate oversight of distance education; common standards across modes	Transition rules, mode-neutral standards, role of states
Graded autonomy linked to accreditation	Accredited institutions gain freedom; others need support	Accreditation readiness, data systems, governance reform
Academic Bank of Credit; multiple entry and exit	Learners may move between institutions and modes	Credit recognition, record systems, inter-institutional agreements
Multidisciplinary curricula; four-year undergraduate programme	Course portfolios and credit structures must be redesigned	Curriculum redesign, faculty skills, academic approvals
Technology integration; SWAYAM; Digital University	Open universities as content and technology partners	Platform interoperability, cyber security, digital capacity
Promotion of Indian languages and bilingual teaching	Builds on regional-language strengths of open universities	Translation capacity, multilingual materials
Equity and inclusion; lifelong learning	Fits the access mission of open universities	Targeted support, accessible materials, flexible admission

Note. Compiled by the author from MHRD (2020), UGC (2020, 2021) and Sitharaman (2022).

COVID-19 pandemic reinforced the arguments for flexible provision. Many traditional universities had to move into the online teaching environment as a result of the closure of their campuses in March 2020, while the open universities with previous experience in teaching at a distance saw their teaching approaches become more popular. The same time revealed limitations – some students did not have a device or a good internet connection, assessment was interrupted in all types of institutions. The pandemic therefore not only proves the validity of the ODL model, which inform the objectives of NEP 2020, but also demonstrates the urgency of the policy's technology component, in principle, becoming a regulation.

One part of the policy is worthy of special mention. NEP 2020 recognized ODL as a mode which any suitably recognised institution can offer and does not provide an exclusive role to open universities. It is an interpretation of the text and of the UGC regulations of 2020 and is not a statement, but has

significant consequences. The distinction of open universities is lost, and it is now a requirement to prove value based on quality, reach & cost not status. The policy's focus on flexibility, credit mobility, regional languages and lifelong learning outlines what open universities have always done, and provides an opportunity for them to progress from the periphery to the core of the system.

6. Administrative Issues with Implementation

Based on the current scenario of open universities, a comparison of NEP 2020 and the current scenario shows six clusters of administrative challenges. They are summarised in Table 4 and discussed below. The ratings given in the table are analytical judgements and not measurements.

Table 4

Administrative Challenges for Open Universities under NEP 2020

Domain	Key challenge	Primary responsibility	Priority
Regulatory plurality	Undefined transition to HECI; overlapping authorities; professional-council limits on distance mode	MoE, HECI, UGC, professional councils	High
Governance and autonomy	State control over appointments and budgets; slow academic approvals; accountability for autonomy	State governments, university boards	High
Financing	Fee dependence; uneven state grants; no funding formula for ODL; higher unit costs	MoE, state governments	High
Human resources	Small core faculty; reliance on part-time counsellors; scarce digital and design skills	Universities, state governments	High
Digital infrastructure and learner support	Limited household internet access; ageing study-centre networks; assessment integrity	Universities, MoE	Medium
Quality assurance and credit mobility	Accreditation gatekeeping; trust in credits; digital records for the ABC	HECI, UGC, universities	Medium

Note. Priority ratings are not measured values, but rather an author's analytical evaluation based on document analysis.

6.1 Charters, Collective Worship and Collective Remembrance

An open university is subject to multiple authorities. It is defined by its powers in its enabling Act, the visitor is provided for by the state government or the Government of India, the appointment of the vice-chancellor is controlled by the state government, in most instances, it receives funding from the state government or the Government of India, and programmes are recognised by professional councils such as the UGC and the Distance Education Bureau. NEP 2020 aims to phase out this multiplicity of

regulators by introducing the HECI in its place, but as of early 2022, the HECI was not legislated and the transition manner was not specified. Open universities are thus forced into a somewhat uncertain future of regulation, lacking of time and specific rules.

The second challenge is a policy that is mode neutral. The 2020 UGC regulations allow any sufficiently accredited institution to offer ODL and online programmes without prior permission (UGC, 2020), which narrows the regulatory distinctiveness open universities once held relative to the distance directorates of conventional universities. Third, professional councils often restrict distance-mode delivery in specific fields, so the openness of NEP does not automatically translate into permission to teach those programmes.

6.2 Governance and Autonomy

NEP 2020 envisages institutions led by independent boards of governors, with graded autonomy linked to accreditation. State open universities, by contrast, generally function within the governance framework of their state Acts, in which governments exercise considerable influence over appointments, budgets and statutes. Delays in appointing vice-chancellors and other statutory officers, where they occur, weaken strategic planning in institutions that depend on long production cycles for course materials. The academic organisations of open universities are also set up for on-campus discussion and can be slow to endorse the constant changes that are needed in digital and credit courses.

A shift towards autonomy, without increased accountability, is also likely to lead to uneven standards in a setting where a student is unlikely to be able to evaluate the institution before attending. The issue for administration is to create governance that gives freedom to innovate, but also sets clear expectations around performance in a transparent way.

6.3 Financing

Open universities, as conceived, were to be low-cost providers, and the economics cited by Rumble (1997) are based on large numbers of enrolments, co-development of courses, and efficient administration. Many state open universities are heavily dependent on learner fees and have little opportunity to cross-subsidise investment in technology or learner support, with only uneven state funding. The vision of NEP 2020 is the same as 6 per cent GDP in public expenditure on education (MHRD, 2020), but it doesn't specify how public funds will be used in ODL, and the Higher Education Grants Council has no formula for ODL.

The cost of the policy commitments to quality online provision, multilingual content, accessible materials for learners with disabilities, and increased counselling will also increase unit costs. If they are not considered in a financing model, open universities could either increase the tuition, thereby compromising access to higher education, or decrease the support, thereby compromising quality in higher education.

6.4 Human Resources

Open universities are staffed along lines of a small group of full-time academic and administrative staff, and a large number of part-time academic counsellors, evaluators and course writers on honoraria. This is an inexpensive, yet light-sensitive model. The faculty attitude, workload, and infrastructure were cited in the research findings conducted by IGNOU as a constraint that hinders the adoption of e-learning (Panda & Mishra, 2007), and this factor is expected to remain the same. The NEP 2020 calls on

institutions to provide a multidisciplinary curriculum, four-year programmes, interactive online learning and stringent assessment, which demands instructional design, learning analytics, multimedia production and cyber security skills that are not typically included in traditional staffing patterns.

Many public institutions are slow to recruit, salaries of technical specialists are often inadequate, and part-time counsellor staff members are not usually part of a structured development program. Capacity building for various other reforms is therefore not something that can be added on, but is a condition.

6.5 Digital Infrastructure and Learner Support

While providing a prominent role to Technology in NEP 2020, open universities cater to a lot of technology-sceptical learners. According to the 75th round survey conducted by the National Statistical Office (2019), only around 24 per cent of Indian households had internet access, with rural households having access to the internet in about 15 per cent; compared with other states, large differences were observed. A transition to internet-based delivery with no investment in access can, therefore, increase the disparities that the policy aims to address.

There should also be a physical infrastructure comprising regional and study centres that will continue to serve the needs of open universities for counselling, practical work, and examinations, which should be maintained and enhanced alongside the development of online learning. Examination and evaluation systems should support the integrity and fairness of the assessment process in a partially online setting, and student information systems should be interoperable with national systems. These tasks require ongoing technical management and are not simply a matter of buying.

6.6 Quality Assurance and Credit Mobility

The UGC regulations for 2020 bind freedom to offer ODL and online programmes to accreditation or ranking and thereby make QA a gatekeeping mechanism instead of a review process (UGC, 2020). An open university with a non-existent high rating may be at a disadvantage compared to other open universities with a high rating. The quality assurance literature (e.g., Jung & Latchem, 2012) highlights that the accreditation instruments of campus institutions also do not fit well with distance provision.

The second pressure comes from the ABC. To accept credits from open universities, other institutions have to show a similar level of rigor in grading and have digital records that are also gradeable on a national standard (UGC, 2021). Credits are not only recognised technically, but as a result of trust between institutions, established through the introduction of agreed standards, clear evaluation and uniform results. In the absence of trust, the disputes over equivalence between modes will not be easily settled by any regulation as learners move between modes.

The six clusters are interrelated. Financial weaknesses limit technology and recruitment, and quality and credit recognition, limiting enrolment and fees. A reform focused on one cluster will thus be doomed to failure. They will be covered in the next section with the framework.

7. An Implementation Framework

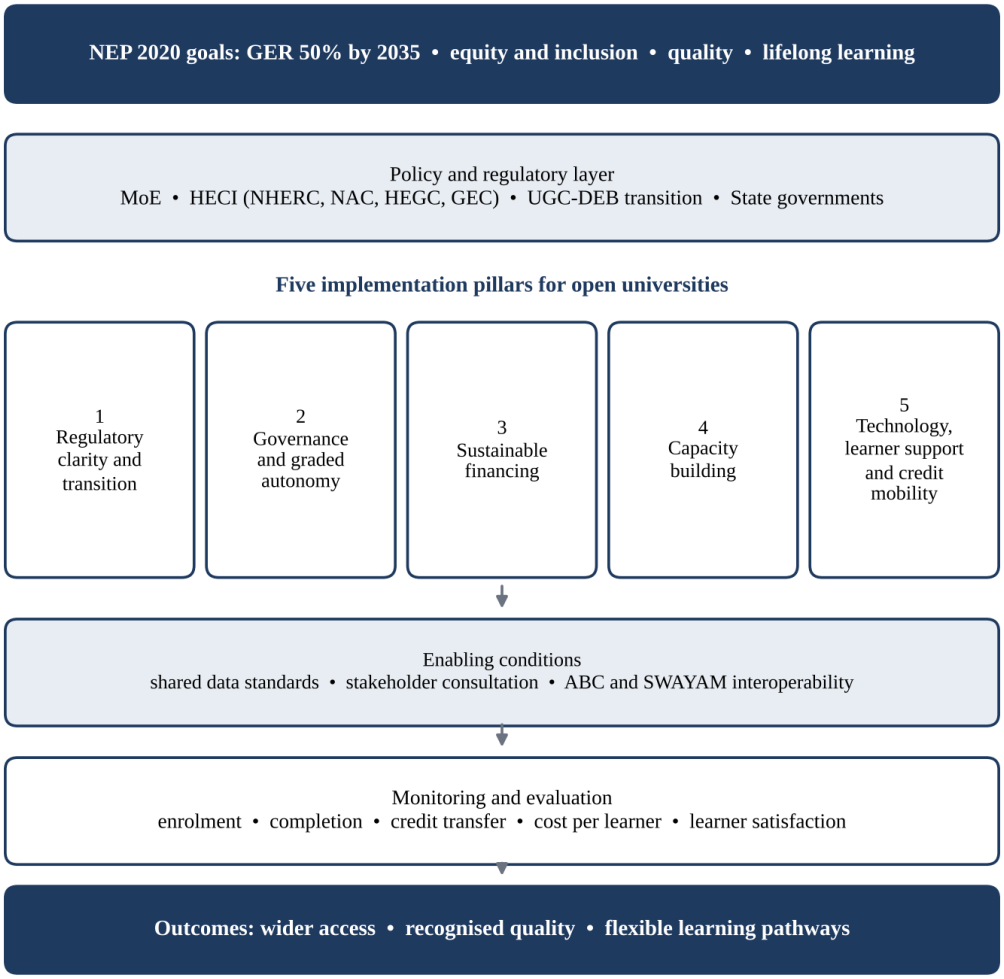
7.1 Design Principles

There are four principles that underlie the framework. It is mode-neutral for standards and mode-sensitive for resources in that open universities need to meet the same standards, but get resources appropriate to distance provision. It is phased, as many NEP instruments, the HECI amongst them, the National Higher Education Qualifications Framework and the reformation of accreditation, will come to

maturity at different times. It is federal, recognising the fact that the majority of open universities are state institutions. It is measurable and therefore can be tracked along with access, equity and quality indicators. Its structure is as depicted in Figure 2.

Figure 2

Proposed Implementation Framework for Open Universities under NEP 2020



Note. Author's framework. MoE = Ministry of Education; HECI = Higher Education Commission of India; NHERC = National Higher Education Regulatory Council; NAC = National Accreditation Council; HEGC = Higher Education Grants Council; GEC = General Education Council; DEB = Distance Education Bureau; ABC = Academic Bank of Credit.

7.2 Pillar 1: Regulatory Clarity and Transition

The Ministry of Education and proposed HECI should put together a transition protocol that explains how current UGC-DEB recognitions will translate to the new scheme, the length of validity of existing approvals and the standards for ODL/online programmes. The duplication of the single window process for programme approval and the involvement of the professional councils in the same process would bring reduction in duplication. The standards should state the outcomes of learning or learning outcomes, assessment integrity and learner support, not the mode, thus equating standards for open

universities with conventional ones. The protocol should be drafted in consultation with the states as its enabling Acts will need to be amended in parallel.

The second pillar of 7.3 aims to enhance governance and provide greater independence.

Accreditation should go hand in hand with autonomy step by step. There could be also greater autonomy for open universities that have good accreditation results, in terms of programme launch, fee levels within a set range and recruiting, with others being guided in their development by their institutional development plans. Accountability would be meaningful by having a short performance agreement with each open university and funding authority, which would outline a handful of markers for access, completion, quality and cost. The Boards should have representatives from the technology, finance and learner support sectors, and the deadlines for statutory positions should be established.

7.4 Pillar 3: Sustainable Financing

A hybrid financing scheme is suggested. It would include a core grant that would cover essential infrastructure and counsellor networks, and then an element based on performance, linked to agreed-upon "compact" indicators, along with grants for innovation – such as the development of multilingual content or accessible materials. There would be less duplication across the over a dozen state institutions, with a common learning management platform and examination systems. The fee policy should be reviewed to ensure that the disadvantage of the learner has not been removed from the ability to meet expenses for the costs of their education, and costs to recover through the fee structures should be funded and transparent to the learner.

7.5 Pillar 4: Capacity Building

A national programme for ODL practitioners, based on an institution like IGNOU, can be designed to train faculty members, instructional designers, assessment specialists and administrators, and could also certify the pool of part-time counsellors. Technical specialist career paths should be established, and pay and promotion criteria should be designed to allow recruitment. Peer learning networks of open universities would enable open universities to share their good practices and course materials, in continuation with the open educational resources approach mentioned by Kanwar et al. (2010).

7.6 Pillar 5: Technology, Learner Support and Credit Mobility

The open universities should have interoperable systems interwoven with ABC, SWAYAM and the national digital repositories with common standards of data for learner records. A hybrid support model must maintain study centres and regional centres but must increase delivery via mobile-first and low-bandwidth solutions, community access points and offline delivery of content. Assessment integrity – whether online assessments are secure and for learners who do not have the internet, credible alternatives, is essential. Agreements to recognise credits between institutions, based on an agreed transparent mapping of the courses and outcomes, would thus become a normal administrative procedure and not an exception to the negotiated process of moving from one course to another.

Different actors should take the leading role in the pillars. The Ministry of Education and the HECI are responsible mainly for regulatory clarity and for national standards for data and credit recognition. State governments are in command of the governance reform and the basic financing of state open universities. It is the responsibility of the universities themselves to drive accreditation readiness, to redesign the academic programmes and to provide support to learners and to embrace shared systems.

The experience of the learners, employers and civil society organisations is the most reliable indicator of the effectiveness or otherwise of the framework, and they should be consulted at advisory forums.

7.7 Phasing, Monitoring and Risks

Table 5 outlines a four-phase process, from 2022 to 2035, for which Nature-Based Solutions offer a solution. The initial phase focuses on clarity, data, and readiness, which are key for later reforms. Shared platforms, trained staff and credit recognition are established before the pursuit of scale.

Table 5

Proposed Phasing of the Implementation Framework, 2022–2035

Phase	Period	Priority actions	Indicative indicators
1. Foundation	2022–2024	Mapping of institutions; transition protocol; accreditation readiness; ABC onboarding; common data standards	Open universities on ABC; accreditation status; reporting system in place
2. Consolidation	2025–2027	Shared learning platform; national ODL professional programme; performance compacts; fee and funding reform	Staff trained; compacts signed; unit-cost data available
3. Scale	2028–2031	Expansion in underserved regions; multilingual and accessible content; credit mobility at scale	Enrolment by group and region; credits transferred; completion rates
4. Maturity	2032–2035	Independent evaluation; revision of standards and funding; integration with national digital systems	Contribution to GER; learner satisfaction; cost per learner

Note. Author's proposal. Periods are indicative and should be adjusted as the HECI and related instruments take shape.

Enrolments by gender, social group and region; completion rates; credits transferred via the ABC; cost per learner; learner satisfaction; and the impact of ODL on GER growth should be monitored using a small number of indicators. Data should be gathered using a standardised MIS and reported annually (independent checks should be carried out at the end of the second and third phases). Three hazards should be considered: policy drift where the HECI is delayed; fragmentation where states proceed at different paces; and quality dilution where increasing scale is tried before providing support systems. Each of these risks is addressed by the phasing, the performance compacts and the shared services as proposed above.

8. Discussion and Policy Implications

The analysis implies that the role of the open universities in the NEP target is more dependent on the administrative coherence rather than the new aspirations. The disparity between the recent growth of GER and the growth needed by 2035 is significant and ODL is one of the few modes which can deliver the required growth rate. However, the goal isn't necessarily speed. The framework thus represents three tensions. It would be a short-sighted approach to expand enrolments quickly without investing in support and assessment services or an increase in quality, and it would be the same mistakes that have affected reputation of distance education in the past that would be repeated. The second is that of autonomy and accountability - freedom comes with the provision of high performance. The third is the interplay between competition and complementarity: when there are learners using both open universities and traditional universities, it is often beneficial to share content, credits and data as well as sharing the same learners.

Four implications follow. However, the first step is that the Ministry of Education and the HECI, as soon as established, should also publish a protocol and mode-neutral outcome standards as early as possible. Second, state governments should revise the enabling Acts of their open universities to make governance commensurate with the level of autonomy and to ensure that the core of open universities receives a fixed amount of funding. Third, open universities should place accreditation, induction to the ABC and shared platforms as urgent priorities as they will shape the freedom to use them and the credibility they enjoy. Fourth, the national statistical system needs to better report the statistics of ODL, separating open universities from distance directorates and report learners by place of residence, for better evidence to measure progress.

Equity is especially important when it comes to implementation. Many first generation learners, females, working adults, residents of rural and tribal areas, are enrolled in open universities, and a learning model that relies on a digital approach may inadvertently be a more effective means for reaching an already connected learner community. Specific solutions are needed: Inclusive materials for learners with disabilities, support in the regional languages, community access points, and flexible fee systems, etc. Expansion should be assessed not only by the number of equities that are enrolled, but also by who the equities reach. The performance compacts should include equity indicators.

There are some limitations to the study that will suggest directions for further research. There is a need to do empirical work on the cost per learner, completion, and learning outcomes in open universities, the experience of administrators in implementing NEP provisions, and the experience of learners accessing technology in the various regions of the country. The framework proposed here could also be tried and tested through comparative studies of countries where national open universities have been embedded in broader higher education systems like China, South Korea and the United Kingdom.

9. Conclusion

The vision for NEP 2020 is ambitious for India's higher education system, and open universities are among the institutions most well suited to support this vision. They are experienced in serving poorly served campuses, creating materials at scale, and delivering to remote locations with technology. But there are a lot of administrative issues that remain unanswered by the policy for them, such as how they will be regulated and by whom and by which standards, how they will be governed and funded, how their staff will be taught new skills, how their learners will have access to technology, and how their credits will be recognised.

This paper has demonstrated that these questions can be clustered into six distinct but interdependent areas of challenge and has suggested a five-pillar approach with a phased time frame (until 2035) to tackle these questions collectively. It seeks clarity from regulators, autonomy of government equal to accountability, performance-based and stable funding, long-term investment in people, and interoperability between systems to enable learners to transfer between institutions and modes. All of these proposals can be implemented by existing institutions, and none of them are without costs and are not rapid.

The main idea is that the achievement of NEP 2020 to scale up access will depend upon the quality of administration as much as the desire for the NEP 2020 targets. Open universities that are treated as peripheral will be more difficult to achieve GER; but if treated as strategic partners in a coherent national system, they can contribute to the openness, flexibility and equity of higher education for a much larger proportion of India's learners.

REFERENCES:

1. Aithal, P. S., & Aithal, S. (2020). Analysis of the Indian National Education Policy 2020 towards achieving its objectives. *International Journal of Management, Technology, and Social Sciences, 5*(2), 19–41.
2. Bates, A. W. (2019). *Teaching in a digital age: Guidelines for designing teaching and learning* (2nd ed.). Tony Bates Associates.
3. https://opentextbc.ca/teachinginadigitalage/
4. Daniel, J. S. (1996). *Mega-universities and knowledge media: Technology strategies for higher education*. Kogan Page.
5. Education Commission. (1966). *Education and national development: Report of the Education Commission 1964–66*. Ministry of Education, Government of India.
6. Garg, S., Venkaiah, V., Puranik, C., & Panda, S. (Eds.). (2005). *Four decades of distance education in India: Reflections on policy and practice*. Viva Books.
7. Government of India. (1985). *The Indira Gandhi National Open University Act, 1985* (Act No. 50 of 1985). Ministry of Law and Justice.
8. Jung, I., & Latchem, C. (Eds.). (2012). *Quality assurance and accreditation in distance education and e-learning: Models, policies and research*. Routledge.
9. Kanwar, A., Kodhandaraman, B., & Umar, A. (2010). Toward sustainable open education resources: A perspective from the Global South. *American Journal of Distance Education, 24*(2), 65–80.
10. Kumar, K., Prakash, A., & Singh, K. (2021). How National Education Policy 2020 can be a lodestar to transform future generation in India. *Journal of Public Affairs, 21*(3), Article e2500.
11. Manjulika, S., & Reddy, V. V. (1996). *Distance education in India: A model for developing countries*. Vikas Publishing House.
12. Mazmanian, D. A., & Sabatier, P. A. (1983). *Implementation and public policy*. Scott, Foresman.
13. Ministry of Education. (2021). *All India Survey on Higher Education 2019–20*. Government of India. https://aishe.gov.in/
14. Ministry of Human Resource Development. (2019). *All India Survey on Higher Education 2018–19*. Government of India. https://aishe.gov.in/

15. Ministry of Human Resource Development. (2020). *National Education Policy 2020*. Government of India.
16. https://www.education.gov.in/sites/upload_files/mhrd/files/NEP_Final_English_0.pdf
17. Moore, M. G., & Kearsley, G. (2012). *Distance education: A systems view of online learning* (3rd ed.). Wadsworth Cengage Learning.
18. National Statistical Office. (2019). *Household social consumption on education in India: NSS 75th round (July 2017–June 2018)*. Ministry of Statistics and Programme Implementation, Government of India.
19. Panda, S. (Ed.). (2003). *Planning and management in distance education*. Kogan Page.
20. Panda, S., & Mishra, S. (2007). E-learning in a mega open university: Faculty attitude, barriers and motivators. *Educational Media International*, *44*(4), 323–338.
21. Peters, O. (2010). *Distance education in transition: Developments and issues* (5th ed.). BIS-Verlag, Carl von Ossietzky University of Oldenburg.
22. Pressman, J. L., & Wildavsky, A. (1973). *Implementation: How great expectations in Washington are dashed in Oakland*. University of California Press.
23. Rumble, G. (1997). *The costs and economics of open and distance learning*. Kogan Page.
24. Sitharaman, N. (2022). *Budget speech 2022–2023*. Ministry of Finance, Government of India. https://www.indiabudget.gov.in/
25. University Grants Commission. (n.d.). *Credit transfer*. UGC MOOCs. https://ugcmoocs.inflibnet.ac.in/index.php/credit_transfer
26. University Grants Commission. (2020). *UGC (Open and Distance Learning Programmes and Online Programmes) Regulations, 2020*. The Gazette of India.
27. University Grants Commission. (2021). *UGC (Establishment and Operation of Academic Bank of Credits Scheme in Higher Education) Regulations, 2021*. The Gazette of India.